Remarks

Applicant thanks the Examiner for the careful consideration of this application. Reconsideration of this application is now respectfully requested in view of the above amendments and the following remarks.

Claims 2-26 and 28-38 are now pending, with Claims 9, 28, and 33 being independent claims. Claims 1 and 27 have been cancelled without prejudice. New Claims 37 and 38 have been added.

New formal drawing sheets have been submitted to replace the original drawing sheets containing Figs. 1-11, in accordance with the requirements noted in the Notice of Draftsperson's Patent Drawing Review accompanying the Office Action. No substantive changes were made to any of the drawings.

At Pages 2-6, the Office Action rejects Claims 1-4, 6-9, 11, 13-20, 22-25, 27, 30-33, and 36 under 35 U.S.C. § 102(e) as being anticipated by Wood et al. (U.S. Patent No. 6,091,808). At Pages 7-10, the Office Action rejects Claims 5, 12, 21, and 26 under 35 U.S.C. § 102(e) as being unpatentable over the combination of Wood et al. with Schnarel et al. (U.S. Patent No. 6,389,124) and Claims 10, 28, 29, 34, and 35 under 35 U.S.C. § 102(e) as being unpatentable over the combination of Wood et al. with Haserodt (U.S. Patent No. 6,031,836). It is respectfully submitted that the rejections of Claims 1 and 27 are now moot in view of their having been cancelled. The rejections of Claims 2-26 and 28-36, however, are respectfully traversed for the following reasons.

Claim 9 has been amended to include the limitations of Claim 1 (now cancelled), from which it originally depended, and is now an independent claim. In particular, the invention, as claimed in Claim 9, is directed to a computer system to provide at least one telephone feature to a telephone of a user. The computer system receives instructions regarding the at least one telephone feature via a network from a graphical user interface operating on a computer of the user. The network comprises a bi-directional layer to communicate between the computer system and the computer and a uni-directional layer to communicate from the computer system to the computer.

In rejecting Claim 9, the Office Action cites Wood et al. at col. 4, lines 32-36, for the bi-directional layer and col. 7, lines 5-9, for the uni-directional layer. However, it is respectfully submitted that these passages do not teach the existence of both bi- and uni-directional layers. Col. 4, lines 32-36, describes a subscriber interface that permits the subscriber to manage at least some telephone functions. Col. 7, lines 5-9, discusses that error and/or status messages can be communicated and displayed on a web page. However, **neither one of these passages discusses in any way discusses the use of different layers for communication.** The type of communications described in these passages could be carried out using many different arrangements, and the use of both bi-directional and uni-directional layers is **not** required.

Additionally, nowhere else in Wood et al. has Applicant found any such teachings. Therefore, it is respectfully submitted that, for at least these reasons, Claim 9 is allowable over Wood et al., and it is requested that the rejection thereof be withdrawn.

Claims 2-8 and 10-26 have been amended, as needed, so that they all depend from Claim 9. Therefore, it is further submitted that Claims 2-8 and 10-26 are allowable for at least the same reasons for which Claim 9 is allowable.

Claim 33 has been amended to include the limitations of Claim 9. Therefore, it is further submitted that the above arguments apply to Claim 33 (and its dependent claims, Claims 34-36) and that, therefore, Claims 33-36 are allowable over the cited prior art.

Claim 28 has been amended to incorporate the limitations of Claim 27 (now cancelled), from which it originally depended, and is now an independent claim. Claim 28 has also been amended to clarify that a refresh request is sent to the graphical user interface to prompt a request for an update (see specification at page 12, lines 14 ff.). In particular, Claim 28 is directed to a method comprising providing a graphical user interface via a network to a computer of a user; controlling a telephone of the user according to input received from the graphical user interface on the computer of the user; updating the graphical user interface on the computer of the user via the network; receiving call information regarding the telephone; sending a refresh request to the graphical user interface to prompt a request for an update on a state of the telephone; and receiving an update request from the graphical user interface for the update on the state of the telephone.

As discussed above, Claim 28 was rejected over the combination of Wood et al. with Haserodt. In particular, the Office Action relied on Wood et al. at col. 5, lines 3-7, and col. 7, lines 5-9, to teach the sending of a refresh request to the graphical user interface to request an update on the state of the telephone. According to the Office Action, these passages address

notification of state change. Wood et al. at col. 7, lines 5-9, is also relied upon by the Office

Action to teach receiving an update on the state of the telephone. However, the Office Action

goes on to state that Wood et al. does not specifically teach receiving an update request, but it

further asserts that Haserodt at col. 2, lines 35-39, teaches receiving a request from a graphical

user interface for displaying a web page.

First, Wood et al., col. 5, lines 3-7, states, "The web page manager 36 is a software

application that manages the presentation of the call management web pages to the subscriber via

the web 20, and that can easily be provided in known manner to provide any desired web

appearance." Applicant fails to understand how this teaches anything about sending refresh

requests to a graphical user interface to request an update (i.e., to prompt a request for an update),

as claimed.

Second, Wood et al. at col. 7, lines 5-9, as discussed above, treats the transmission of

error/status messages from telephone switch 16 to web page manager 36. This, too, is not

relevant to the limitation to which the Office Action applies it. It does not teach sending a

refresh request to a graphical user interface to prompt a request for an update. It also does not

teach that a graphical user interface sends an update request to receive an update on the state of

the telephone, as claimed.

Turning now to Haserodt, the Office Action cites col. 2, lines 35-39 as teaching

"receiving a request from the graphical user interface for displaying a web page." However, the

cited passage states, "A WWW browser of a client requests a WWW page that defines a

telephony feature form from a WWW server via the Internet. The WWW server responds by

providing the requested WWW page to the client via the Internet." While this may teach requesting display of a web page, it still fails to remedy the deficiencies of Wood et al., as discussed above.

Applicant has found no evidence that either Wood et al. or Haserodt, either individually or in combination, teaches the sending of a refresh request to the graphical user interface to prompt a request for an update on a state of the telephone and receiving an update request from the graphical user interface for the update on the state of the telephone. Therefore, it is respectfully submitted that Claim 28, as well as its dependent claims, Claims 29-32, are allowable over the cited prior art.

In addition to the above reasons, there are further reasons why the following dependent claims are submitted as being allowable over the cited prior art:

- Claim 3: As discussed above in connection with Claim 28, Wood et al. fails to teach the prompting of a user computer to request a status update.

- Claim 8: Applicant is unable to find any teaching in Wood et al. (cited portion: col. 4, lines 32-39) of the use of a client push protocol and a call client protocol for respective types of communication, as claimed.

- Claim 16: The Office Action cites Wood et al. at col. 5, lines 3-7 and 37-39, as teaching the inclusion of a web portal as part of the graphical user interface. However, the cited portions of Wood et al. are directed to the *appearance* of a web page. As discussed in the specification at page 22, lines 22-23, a web portal provides

a particular *functionality*. Such functionality is nowhere discussed in Wood et al. (either in the cited portions or elsewhere).

- Claim 18: The Office Action cites Wood et al. at col. 9, lines 3-14, as teaching that the graphical user interface includes a first icon to access a network site of an organization and a second icon to dial a telephone number of the organization. Col. 9, lines 3-14, are directed to the access and use of a national directory by clicking on a button and possibly dialing a phone number from the directory by selecting it and clicking on another ("DIAL") button. This is not what is claimed. Claim 18 requires two icons, one that takes the user to a particular organization's web site and another that dials that same organization's telephone number. In col. 9, lines 3-14, one goes to a web site of one organization (a national directory) and uses it to obtain a phone number for a different organization.

- Claim 26: Claim 26 is directed to the use of more than one graphical user interface on a single computer to control more than one corresponding telephone. The Office Action relies upon Schnarel et al. at col. 4, lines 55-65, to teach this feature. This passage in Schnarel et al. is directed to the use of one or more "call slips" corresponding to one or more telephone *lines*. However, there is no indication that these correspond to more than one *telephone*. It appears, rather, that the disclosed software system is designed for a single telephony device that may interact with multiple lines (see, e.g., Schnarel et al. at cols. 23-26).

For at least these further reasons, it is further submitted that these claims are allowable over the
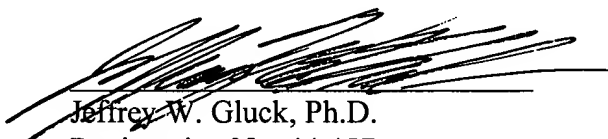
cited prior art.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed,

accommodated, or rendered moot. Applicant, therefore, respectfully requests that the Examiner

reconsider all presently outstanding objections and rejections and that they be withdrawn.

Applicant believes that a full and complete reply has been made to the outstanding Office Action

and, as such, the present application is in condition for allowance. If the Examiner believes, for

any reason, that personal communication will expedite prosecution of this application, the

Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,

Date: July 9, 2004

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DC2-547634
VBHC Rev. 07/08/04 jwg